

1.0 Purpose. This document:

- C promulgates the OMAO Environmental Compliance Manual.
- C defines the OMAO environmental compliance program.
- C identifies policy and procedures to ensure continued compliance with applicable environmental laws and regulations and maintenance of an environmentally safe and healthful workplace.

2.0 Scope. The information provided is applicable to OMAO centers, ship bases, and all NOAA ships and aircraft. Its coverage is limited to those actions and responsibilities necessary to ensure compliance with applicable environmental laws and regulations and maintenance of an environmentally safe and healthful workplace.

3.0 Background. The OMAO Environmental Compliance Manual consolidates information pertaining to applicable environmental laws and regulations and provides guidance to OMAO centers, bases, ships, and aircraft. The environmental compliance manual and this document replace the NOAA Fleet Hazardous Materials and Hazardous Waste Manual, dated December, 1986, and NCINST 6280B, and its changes, dated March 20, 1992.

4.0 Policy. It is the policy of OMAO to:

- C promote, facilitate, and ensure compliance with all Federal, state, and local environmental laws and regulations.
- C prevent pollution, minimize waste, conserve natural resources, and reduce adverse environmental impacts.

4.1. OMAO will implement an environmental management system (EMS). Development of the EMS will be based on application of EPA's Code of Environmental Management Principles for Federal Agencies (CEMP). The five management principles that make up the CEMP as endorsed by the Department of Commerce and NOAA are:

- C Management Commitment - written statements regarding commitment and establishment of environmental goals, objectives, roles, and responsibilities.
- C Compliance Assurance and Pollution Prevention - programs, policies, and procedures established to identify, prevent, and correct potential environmental compliance problems.
- C Enabling Systems - provisions for training programs, management tools, and environmental compliance related equipment.
- C Performance and Accountability - establishment of designated responsible officials (DROs), the responsibilities of which are written into performance plans.

- C Measurement and Assessment - establishment of an audit and assessment program to identify accomplishments, deficiencies, program costs, and cost savings.
- 5.0 **Responsibilities.** Delineation of key OMAO environmental-related responsibilities is provided below. A more comprehensive listing of environmental-related duties is provided in Section 2.0 of the Environmental Compliance Manual.
- 5.1. Designated Responsible Officials (DRO) shall be identified at all OMAO locations. The designated responsible official (DRO) is the person at each OMAO facility, ship, or aircraft whose position is most senior, or highest ranking, and whose primary duties include the identification and allocation of work and resources needed to perform the mission of the organization. In keeping with the CEMP, DROs shall demonstrate management's commitment regarding environmental compliance.
- 5.1.1 Specific responsibilities of the DRO, as they pertain to environmental compliance, are:
 - C to ensure that facility operations and activities are conducted in compliance with environmental requirements.
 - C to ensure that on-site personnel are aware of environmental requirements and are properly trained.
 - C to elevate environmental compliance issues to higher levels of management with recommendations for resolution as necessary to ensure compliance.
 - C to allocate resources necessary to ensure environmental compliance.
- 5.1.2 DROs shall identify environmental compliance officers (ECO) and facility environmental coordinators (FEC) to assist OMAO in fulfilling its environmental responsibilities. An ECO shall be assigned at OMAO headquarters, one at each center, and one aboard each NOAA ship. Those personnel assigned as facility managers shall also serve as facility environmental coordinators.
- 5.2. The headquarter's Line Office Compliance Officer (LECO) shall serve as the OMAO environmental compliance program manager and liaison between NOAA Environmental Compliance and Safety Division (ECSD) and OMAO centers and field activities. The headquarters LECO shall perform the following duties:
 - C develop and disseminate OMAO environmental policies and procedures.
 - C provide management oversight consistent with Federal, state, and local laws and regulations, NOAA Office of Finance and Administration (OFA) requirements, and the needs of OMAO centers, ships, and aircraft.
 - C identify projects and resources necessary to maintain compliance and to reach

- program goals.
 - C review the allocation of environmental program resources to ensure they are managed in a manner that will result in consistent and pro-active environmental support and assistance.
- 5.2.1 The OMAO headquarters LECO shall develop an annual operating plan based on regulatory review, program assessment, audit results, and identification of annual requirements such as training, hazardous material inventory management, pollution prevention program and equipment needs, and waste disposal. ECOs assigned at OMAO centers, bases, aboard NOAA ships and aircraft shall provide input for development of the OMAO annual operating plan.
- 5.3 The Marine Operations Center and Aircraft Operations Center Safety and Environmental Compliance Officers (SECO) are responsible for providing technical advice and guidance to the Center Directors, DROs, facility environmental coordinators (FEC), managers, maintenance personnel, vessel and aircraft commands, and others regarding various safety, health, and environmental compliance issues. The SECOs will develop an annual operating plan based on regulatory review, program assessment, audit results, and identification of annual requirements such as training, inventory management, pollution prevention, and waste disposal. The SECOs shall perform the following duties:
 - C Work closely with the LECO, FEC, shipboard ECOs, and aircraft commanders.
 - C Assist in coordinating environmental and safety training for MOC, AOC, OMAO facilities, vessels, and aircraft.
 - C Develop and disseminate MOC and AOC policy and guidance on environmental and safety issues.
 - C Conduct environmental assessments at AOC and MOC facilities and aboard NOAA vessels.
 - C Determine the efficiency and effectiveness of on-site pollution control equipment.
 - C Determine compliance with applicable Federal, state, and local laws, regulations, statutes, and administrative orders.
- 5.4. The OMAO LECO, SECOs, ECOs, and FECs shall communicate on a regular basis and coordinate their work with others in NOAA including NOAA ECSD staff, Administrative Support Centers' Regional Environmental Compliance Officers (RECOs), NOAA's Office of General Council, MacDill Air Force Base Environmental Staff, MOC International Safety Management team, MOC Marine Engineering Division, and OMAO Fleet Inspection.
- 5.5. ECOs and FECs at OMAO centers, facilities, and aboard NOAA ships shall become thoroughly familiar with the content of the OMAO Environmental Compliance Manual

and shall perform environmental duties in accordance with applicable laws and regulations. Those duties shall include:

- C Identification of facility, shipboard, and aircraft activities that may be impacted by environmental laws and regulations.
- C Implementation of pollution prevention initiatives.
- C Management and disposal of hazardous materials and hazardous wastes in accordance with applicable laws and regulations.
- C Maintenance of facility, shipboard, and aircraft environmental capabilities and assets under their purview.

5.5.1 ECOs shall provide guidance and training to those individuals at their facilities, ships, and aircraft regarding those activities which may be regulated by environmental laws.

6.0 **Environmental Projects.** Unresolved environmental issues that require additional resources, or require extended time and effort to address shall be documented and submitted to OMAO environmental compliance personnel in accordance with NOAA environmental project policy. An overview of the procedures for project submission and project management is provided below.

6.1. Environmental projects shall be described (by filling out an environmental prospectus available via the ECS website or hard copy) and submitted to a respective RECO and the appropriate SECO, or facility ECO/FEC. In addition, copies of all project prospectus shall be provided to the OMAO LECO. The LECO and SECO shall be consulted and are available to assist in development of project prospectus prior to submitting.

6.2. Per NOAA environmental project policy, projects will be reviewed for approval and will be prioritized for funding by NOAA Environmental Compliance and Safety Division (ECSD). The OMAO LECO will represent OMAO during prioritization of NOAA projects submitted to NOAA ECSD and shall serve as advocate for OMAO projects that are submitted. Projects will be undertaken based on priority ranking and availability of funds.

6.3. The originator of any given project will generally serve as project manager for those projects to be undertaken. The status of all projects will be reported and tracked by the OMAO LECO.

7.0 **Funding.** Funding responsibilities are identified and defined in detail in NAO 216-17, NOAA Environmental Compliance Program. In general, funding responsibilities are determined based on the type of costs for which funding is needed as described below.

- 7.1. Funding to cover annual operation and maintenance costs associated with environmental compliance, such as permits, training, personal protective equipment, spill response equipment, waste disposal, and other recurring costs shall come from the operating budgets established for each facility, ship, and aircraft.
- 7.2. Funding to cover capital costs associated with environmental compliance, such as system design and alteration to meet new requirements, major equipment design and equipment procurement, and other non-recurring costs shall be sought from the NOAA ECS budget established for this purpose based on submission of project requests described in Section 6.
- 7.3. Funding to cover program costs associated with establishing, maintaining, and improving environmental management policy and procedures shall be shared. For example, costs for initial development of program elements such as ECSD project tracking, environmental compliance auditing, and NOAA-wide training programs will be covered by NOAA ECSD. Costs for maintenance of the aforementioned program elements, along with implementation of Line Office specific programs, are to be covered by NOAA Line Offices.
- 8.0 **Program Assessment.** Strengths and weaknesses of the environmental compliance program shall be assessed annually. Strengths and weaknesses shall be measured based on the results of program audits defined and established under the OMAO environmental compliance audit policy referenced below. Major components of the audit program include:
 - C Self audits at all OMAO centers, facilities, and aboard NOAA ships annually.
 - C Internal program assessments at OMAO centers, facilities, and aboard NOAA ships once every three years.
 - C External audits and assessments as directed.
- 9.0 **References.**
 - 9.1. EPA's Implementation Guide for the Code of Environmental Principles for Federal Agencies (CEMP), dated March, 1997, available via <http://es.epa.gov/oeca/ceмп/ceмпtoc.html>
 - 9.2. NAO 216-17, NOAA Environmental Compliance Program, dated 10/5/98, available via the ECS website, www.ecs.noaa.gov/.
 - 9.3. NOAA Environmental Project Management Policy, dated September 30, 1998, available via the NOAA ECS website, www.ecs.noaa.gov/.

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- 9.4. OMAO Environmental Compliance Audits, dated September 2001, available via MOCDOCS website, <http://205.156.48.106/>
- 9.5. OMAO Environmental Compliance & Guidance Manual, dated October 2001, attached, and also available via the MOCDOCS website.
- 9.6. OMAO Policy Letters and Presentations, Designation of Responsible Officials under NAO 216-17, with attachments, available via MOCDOCS 1998-03-BJT.